

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

INTERNATIONAL UNION,)	Case No. 11-cv-14630
UNITED AUTOMOBILE,)	
AEROSPACE AND AGRICULTURAL)	JUDGE DENISE PAGE HOOD
IMPLEMENT WORKERS OF)	
AMERICA (UAW), and MARTIN)	Magistrate Judge Mona K. Majzoub
LAMER, JOHN YASSO, KIM)	
TASKILA and RONALD GARDNER,)	
)	
Plaintiffs,)	
)	
v.)	
)	
TRW AUTOMOTIVE U.S., LLC,)	
)	
Defendant.)	

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**JOINT STIPULATION TO STAY EXECUTION OF JUDGMENT OF
ATTORNEY'S FEES AWARD PENDING DEFENDANT'S APPEAL**

On September 30, 2019, the Court entered an Order “Granting In Part Plaintiff’s Motions For Attorney Fees and Adopting In Part The Magistrate Judge’s Report And Recommendation” which ordered defendant TRW Automotive U.S., LLC to pay \$183,300.91 in attorney’s fees and costs. (Doc. 86). Plaintiffs and defendant hereby enter the following stipulation pertaining to the Court’s attorney fees and expenses award:

1. Plaintiffs will not seek to enforce the Court’s attorney’s fees and expense award until the conclusion of defendant’s pending appeal with the Sixth Circuit Court of Appeals, case no. 19-2252. In the event the Sixth Circuit upholds the Court’s attorney’s fees and expenses award, in whole or in part, defendant agrees to pay the upheld portion of the Court’s award within thirty days of the Sixth Circuit’s decision.
2. Within 10-days of the filing of this stipulation, defendant will obtain and file with the Court a supersedeas bond in the entire amount of the Court’s attorney fees and expenses judgment plus two years of interest at the rate prescribed under 28 U.S.C. § 1961, plus taxed costs in the amount of \$4,754.81. This bond will act as security for the Court’s attorney’s fees and expenses award. This computation does not preclude plaintiffs from seeking an alternative interest measure, computation or amount after the completion of defendant’s pending appeal with the Sixth Circuit.

/s William Wertheimer (via e-mail consent)
Attorney for Plaintiffs

/s Gregory V. Mersol
Attorney for Defendant